

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

NORTHROP GRUMMAN SHIP SYSTEMS,
INC., f/k/a INGALLS SHIPBUILDING, INC.,

Plaintiff,

v.

CIVIL CASE NO: 02-cv-00785-HSO-RHW

THE MINISTRY OF DEFENSE OF THE
REPUBLIC OF VENEZUELA,

Defendant.

**DEFENDANT’S OPPOSITION TO PLAINTIFF’S MOTION FOR
RELIEF PURSUANT TO 28 U.S.C. § 1610(C) AND 28 U.S.C. § 1963**

The Ministry of Defense of the Republic of Venezuela, by and through its undersigned counsel, hereby files this Opposition to Northrop Grumman’s Motion for Relief Pursuant to 28 U.S.C. § 1610(c) and 28 U.S.C. § 1963, ECF No. 429 (the “Motion”). In support of this Opposition, the Ministry also submits the accompanying memorandum of law. For the reasons addressed in the memorandum of law, the Ministry respectfully requests that the Motion be denied.

Respectfully submitted,

/s/ Quinn Smith

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CERTIFICATE OF SERVICE

I hereby certify that on July 7, 2020, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF filing system. I also certify that the foregoing document is being served this date on all counsel of record or pro se parties on the Service List below in the manner specified, either via transmission of Notices of Electronic Filing generated by the CM/ECF system or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

By: s/ Rodney Quinn Smith
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